

THE LAW OFFICES OF SEAN M. MAHER, PLLC

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SO ORDERED

January 31, 2024

*George B. Daniels*

Defendant's surrender date is adjourned to  
June 1, 2024.

VIA ECF

**JAN 31 2024**

The Honorable George B. Daniels  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

HON. GEORGE B. DANIELS

RE: *United States v. Dos Santos, et al. (Karina Chairez)*, 20 Cr. 398-06 (GBD)  
Defense request to adjourn surrender date

Dear Judge Daniels:

I respectfully write on behalf of Ms. Karina Chairez to request a 4-month adjournment of her date to surrender to the BOP to begin her sentence.

In October 2023, Ms. Chairez had a significant surgery involving her ankle. Her physician has recommended that Ms. Chairez have additional time for post-surgery recovery and rehabilitation before being incarcerated in light of her high risk of injury and disturbance of her gait should she not complete her recovery and rehabilitation. This recommendation is attached as Exhibit A with a request to be filed under seal.

I have provided over 300 pages of medical records to the government relating to Ms. Chairez's surgery and ankle condition. I have relayed the instant request to adjourn Ms. Chairez's surrender date from February 1, 2024 to June 1, 2024. AUSA Kiersten Fletcher has informed me that government consents to the instant request.

The Court's consideration is greatly appreciated.

Respectfully submitted,

/S/

Sean M. Maher

cc: All counsel via ECF (w/o Exhibit)  
Government counsel (with Exhibit)

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